

BASKIN RICHARDS PLC

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Mladen Z. Milovic #035560

Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ARIZONA

United States of America,

Plaintiff,

vs.

David Allen Harbour,

Defendant.

Case No. CR-19-00898-PHX-DLR(DMF)

**DEFENDANT'S NOTICE OF EXPERT
WITNESSES**

Pursuant to the Federal Rules of Criminal Procedure, Rule 16(b)(1)(C), the Scheduling Order, and the Order Extending Expert Witness Disclosures dated May 13, 2020, Defendant David Allen Harbour gives notice of his intent to use expert witness testimony under Rules 702, 703, or 705 of the Federal Rules of Evidence during his case-in-chief at trial.

I. Cathie Cameron CA, CPA, CMA, ABV, CFF, CGMA

Ms. Cameron is an accounting expert and may testify to various accounting summaries and other examination of the accounting and bank records related to the events in this case. Ms. Cameron will summarize how the accounting and bank records reflect the flow of funds to and from lenders, investors, borrowers, the relevant entities, financial institutions, and principal participants. The summaries will address the relevant accounting methods and use of the

1 relevant funds and the fungibility of the money flowing through the relevant accounts. Ms.
2 Cameron's summary analysis will be provided to the government through discovery and
3 separate communications. Ms. Cameron's CV is attached as Exhibit A.
4

5 RESPECTFULLY SUBMITTED this 15th day of June, 2020.
6

7 BASKIN RICHARDS PLC
8

9 /s/ Alan S. Baskin

10 Alan Baskin

11 Mladen Z. Milovic

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14 *Attorney for Defendant*
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CERTIFICATE OF SERVICE

I hereby certify that on June 15, 2020, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF system for filing to:

Kevin M. Rapp
U.S. Attorney's Office
40 N. Central Ave., Suite 1800
Phoenix, AZ 85004
Attorneys for Plaintiff

/s/ Maria Luque Villa

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EXHIBIT A

**Catherine M. Cameron
Ness Consulting LLC**

Phone: 480 247 9099 Email: ccameron@nessexpert.com

Summary

Cathie has extensive experience in damages calculation, forensic analysis, business valuation, audit, accounting, profit analysis and management consulting in a wide variety of industries over her 30-year career working in public accounting, industry and consulting. For the last 20 years she has concentrated on providing consulting services including lost profit calculations, damages analyses, financial and profitability analyses, fraud investigations, and business valuations. As an expert witness she has testified in depositions, in arbitrations and in the courtroom.

Areas of Expertise

- Fraud investigations
 - Ponzi schemes
 - Fictitious investment schemes
 - Schemes to defraud minority shareholders
- Damages calculation
 - Breach of contract
 - Breach of fiduciary duty
 - Business interruption
 - Construction delay
 - Defamation
 - Misappropriation of trade secrets
 - Patent and copyright infringement
- Lost earnings
 - Wrongful termination
 - Personal injury
 - Wrongful death
- Business valuation
 - Buy outs
 - Shareholder disputes
 - Marital dissolution
- Management consulting
 - Profitability analysis
 - Internal control analysis

Professional and Business Affiliations

Scottish Chartered Accountant

Certified Public Accountant

Certified Management Accountant

Accredited in Business Valuation by the American Institute of Certified Public Accountants

Certified in Financial Forensics by the American Institute of Certified Public Accountants

Chartered Global Management Accountant

Education and Training

Master's Degree in Mathematics and General Philosophy from Glasgow University in Scotland
Post-graduate Certificate in Accountancy from Stirling University in Scotland

Previous Work Experience

Berkeley Research Group, Phoenix, AZ (acquired Phoenix office of LECG)
LECG, LLC, Phoenix, AZ (acquired Lancaster Consulting LLC)
Lancaster Consulting, LLC, Phoenix, AZ
Campbell & Co, Scotland
First Bus PLC, England
Grant Thornton, England

Speaking Engagements

Damages Overview for Lawyers, July 2004
Interpretation of Financial Statements, September 2004
Adjustments to Financial Statements in Business Valuations, November 2004
Business Valuation – Premiums and Discounts, November 2004
The Relationship Between Experts and Lawyers, October 2014

Articles

The Five Worst Things A Damages Expert Can Hear, Arizona Women Lawyers Association Maricopa Chapter, February/March 2007
Risk Free or Not Risk Free, That is the Question, AICPA Corporate Finance Insider, November 2011
Costing in Damage Calculations, AICPA Corporate Finance Insider, December 2011
Business Torts: A Practical Guide to Litigation, American Bar Association, Co-author of Chapter 8, Expert Witnesses, 2014
Taking the Stand, New Law Journal, October 2014

Recent Testimony

State of Arizona v. Michael Thornton
Criminal theft and fraud
Hearing testimony: February 2013

James R. Chaffin, DDS, et al v. The Dentists Insurance Company, et al
Negligence, breach of contract and bad faith
Trial testimony: April 2013

Ethan Lock, et al v. Your Source Pacific Fund I, LLP, et al

Breach of contract

Deposition: April 2013

Deposition: June 2013

Valuation hearing testimony: July 2013

Trial testimony: October 2013

Amie Gressett v. Central Arizona Water Conservation District

Wrongful termination

Deposition: October 2013

Trial: March 2015

Mary Irene Brooks v. Chubb & Son

Wrongful termination

Deposition: February 2014

Borger v. All Wet Scuba, LLC, et al

Wrongful death

Deposition: August 2014

Bennett v. Pratt Regional Medical Center Corporation, et al

Medical malpractice

Deposition: August 2014

Pingtella v. Zurich American Insurance Company, et al

Wrongful termination

Deposition: December 2014

Vicki Sevedge, et al v. 15030 North Tatum, LLC, et al

Breach of contract, business interruption

Trial: April 2015

Stefanie Fisher v. USAA

Personal injury, business interruption

Arbitration: November 2016

Raymond Nagy v. USAA

Personal injury

Arbitration: February 2017

Stuart Glenn v. Costco Wholesale Corporation

Wrongful termination

Deposition: February 2017

Andy Dixon v. Swift Transportation Company, et al

Personal injury

Deposition: March 2017

Lydia Merck v. Swift Transportation Company, et al

Personal injury

Deposition: November 2017

Atelier, Inc. v. Loren, et al

Tortious interference and breach of contract

Deposition: January 2018

LaserMasters, LLC, et al v. Liberty Parts Team, Inc., et al

Tortious interference and breach of contract

Deposition: February 2018

Mr. & Mrs. McCalmont v. Federal National Mortgage

Federal Credit Report Act Violations

Deposition: March 2018

American Soccer Marketing, LLC, et al. v. United Soccer Leagues, LLC

Breach of contract

Arbitration testimony: April 2018

David & Kelly Potter v. M&O Agencies Incorporated

Negligence

Deposition: April 2018

Trial: March 2019

IPFS Corporation v. Cynthia G. Scott

Breach of contract

Deposition: September 2018

Marouk v. Marouk

Business valuation

Trial: November 2018

Hinds v. Bales

Defamation and tortious interference

Deposition: November 2018

Trial: September 2019

Messer v. Sims

Business dissolution

Arbitration: November 2019